

**ORIGINAL****United States District Court**

NORTHERN

DISTRICT OF

TEXAS

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS**FILED****MAR 28 2008**

CLERK, U.S. DISTRICT COURT

By [Signature]  
Deputy

UNITED STATES OF AMERICA

V.

DONALD BRANTMAN, JR. (1)

**CRIMINAL COMPLAINT**CASE NUMBER: 3:08-MJ- 123

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. From on or about March 17, 2008 through March 28, 2008, in Hunt County, in the Northern District of Texas and elsewhere, defendant did,

use a facility and means of interstate commerce to knowingly attempt to persuade, induce, entice, or coerce a person under the age of 18 years of age to engage in sexual acts

in violation of Title 18, United States Code, Section(s) 2422(b).

I further state that I am a Special Agent of the Department of Homeland Security, U.S. Immigration and Customs Enforcement, and that this complaint is based on the following facts:

See attached Affidavit of Special Agent Bradley Hudson, which is incorporated and made a part hereof by reference.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

[Signature]  
Bradley Hudson, Special Agent  
Department of Homeland Security,  
U.S. Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence, on this 28 day of March 2008, at Dallas, Texas.

**HONORABLE PAUL D. STICKNEY**  
**UNITED STATES MAGISTRATE JUDGE**  
Name & Title of Judicial Officer

[Signature]  
Signature of Judicial Officer

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Bradley Hudson, Special Agent (SA), with the Department of Homeland Security, Immigration and Customs Enforcement, Dallas, Texas, being duly sworn, depose, and state the following, which I believe to be true and correct to the best of my knowledge:

**INTRODUCTION**

1. I am a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement (ICE). I have been employed as a federal law enforcement officer for eight years and as a law enforcement officer for a total of 11 years. From 1998 through 2002, I was employed as a United States Customs Service Special Agent. From 2002 until May of 2006, I was employed with the Federal Air Marshal Service as an Air Marshal. In May of 2006, I joined ICE as a Special Agent. Prior to becoming a federal law enforcement officer, I was employed as a Mississippi State Trooper for three years. As part of my duties as an ICE agent, I investigate criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal production, distribution, receipt and possession of child pornography, in violation of 18 U.S.C. §§ 2252 and 2252A. I have experience conducting criminal investigations concerning internet crimes against children and training in undercover online internet investigations. This affidavit is based upon my personal investigation and on information obtained from other agents and police officers assisting with this investigation.
2. Based upon my investigation detailed below, I believe there is probable cause to find that **Donald Brantman, also known as Donald Brantman, Jr.**, used a facility or

means of interstate commerce to knowingly attempt to persuade, induce, entice, or coerce a person under the age of 18 years of age to engage in sexual acts, in violation of 18 U.S.C. § 2422(b).

**YAHOO SERVICES, INC.**

3. Yahoo Services, Inc., (Yahoo), whose corporate offices are located at 701 First Avenue, Sunnyvale, CA, 94085, is a commercial computer service company that provides services to Internet users that include e-mail, Groups, Internet search capability, games, personal ads, chat, instant messaging, and other services. Many of the services offered by Yahoo are free to the user. Yahoo offers search features as well as multiple links to many web sites both inside and outside of the Yahoo! domain. In addition, Yahoo provides users access to a free Internet based Email account.

4. Users of certain Yahoo services are required to register with Yahoo to obtain a Yahoo ID. A Yahoo ID is a unique identifier of a user's account. The registration process requires the selection of an ID (sometimes referred to as a screen name, Login Name, or profile), a password, and the voluntary supply of some personal information. This process is completed on line. Up to six profiles can be associated with a single Yahoo ID. These profiles are also known as "aliases" and allow the user to appear as someone other than his or her Yahoo ID when using certain Yahoo services. Other users of the service may be able to view the profile information. Yahoo ID registration and profile information is supplied by the user and is not verified by Yahoo.

5. When a user signs up for this service, or any Yahoo service requiring a unique user identity, Yahoo maintains the Internet Protocol (IP) address from which the account

originated. The input information, along with user settings and the original IP address for the unique screen name are also maintained by Yahoo. Once a unique screen name is assigned, the Yahoo user can then send and receive Electronic Mail by logging on to Yahoo's servers. Messages sent and received by the Yahoo user pass through, and are stored on servers maintained by Yahoo. These messages are then downloaded by the Yahoo user to read, or passed outside of the Yahoo domain to the intended recipient. Logs and copies of traffic across Yahoo's servers are maintained for a set period of time determined by the system administrators at Yahoo.

6. Yahoo also offers two real-time communication methods called Yahoo Instant Messenger (IM) and Yahoo Chat. IM is a one-on-one conversation tool that affords two Yahoo users a private forum to type messages back and forth in real time. The use of Yahoo unique screen names allows a user to identify other users. Users who wish to converse via IM can elect to place another user on his or her "Buddy list," to expedite setting up a later conversation. Yahoo Chat is a similar, real-time communication method between Yahoo unique screen names, however this is designed for group conversations. Multiple Yahoo users can access a variety of chat rooms maintained on Yahoo computers and managed by Yahoo.

7. Yahoo Photos is a free service that allows a Yahoo user to upload, store and share photographs with other Yahoo members in different photo albums associated with the user's account. A user can configure his or her account to allow any member of Yahoo to view the contents of an album, or to block or otherwise restrict access to the album.

**PROBABLE CAUSE**

8. On March 26, 2008, I began an investigation based on a lead I received from Texas Ranger Laura Simmons, Texas Department of Public Safety. She had just learned that an individual who called himself "Agent K" and who used Yahoo instant messenger identification "johnbrantmanjr" had been communicating with a 14-year-old-boy via Yahoo Instant Messenger and via cell phone text messages. This individual, later identified as **Donald Brantman, Jr.**, had met this minor online approximately one week ago while the minor was home during spring break the week of March 17, 2008. The minor, who lives in Hunt County, Northern District of Texas, advised that **Brantman, Jr.** had initiated contact with him by sending two instant message communications saying hello, and that during their communications, **Brantman, Jr.** said that he wanted to engage in sexual activity with the minor. The minor said that he told **Brantman, Jr.** that he was 14 years old. He also said that **Brantman, Jr.** initially told him he was 22 years old and then later said that he was 29 years old. The minor advised that they instant messaged and text messaged constantly during the minor's spring break, often chatting late at night. The two discussed getting married, shopped for rings online, and they discussed the possibility of **Brantman, Jr.** coming to Texas for a visit. **Brantman, Jr.** had indicated that he lived in the New York area, and Simmons investigation revealed that the minor occasionally referred to **Brantman, Jr.** as "city boy."

9. On March 26, 2008, Ranger Simmons obtained consent to assume the minor's online identity, "Dakada." I then took over the minor's online presence and changed the

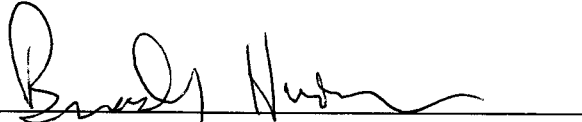
password to ensure that I would have sole access to the contents and communications associated with the profile.

10. On March 27, 2008, I used a computer connected to the internet, a facility of interstate commerce, and signed on to the minor's account as "Dakada" in Yahoo and was immediately contacted by **Brantman, Jr.** During the online Yahoo chat, **Brantman, Jr.** stated that he wanted to have anal and oral sex with Dakada. He also said he wanted to be married to Dekada "no matter his age". Additionally, in other parts of the conversation, **Brantman, Jr.** stated that he wanted to "fuck" Dakada. I asked **Brantman, Jr.** if it was cold in New York, and he responded "my cock will keep you warm." Toward the end of the conversation, **Brantman, Jr.** provided his bus schedule and said he would be arriving at approximately 8:00 P.M. on Saturday, March 29, 2008 in Terrell, Texas. **Brantman, Jr.**, also said he had purchased his ticket in advance and that he was leaving New York City at 3:45 a.m. On several occasions, I asked if I could see my "city boy" through the use of a web camera on the computer **Brantman, Jr.** was using. **Brantman, Jr.** agreed and turned on his web camera allowing your affiant to see an image of his face.

11. I identified the image as **Donald Brantman, Jr.** from a photograph provided by the New York City Police Department and the sexual offender registry in New York. **Brantman, Jr.** has a previous conviction for Attempted Sodomy of a 13-year-old male. On March 28, 2008, Ranger Simmons advised that she spoke with the minor's guardian, who indicated that **Brantman, Jr.** had left a voice mail message on their home phone. In

the message, **Brantman, Jr.** said that he was on the bus and that it was running late by an hour or two. He also said, "Please don't disappoint me."

12. Based upon the foregoing facts and circumstances, I believe probable cause exists to find that **Brantman, Jr.** has intentionally and knowingly committed a violation of Title 18, U.S.C., Section 2422(b), Attempted Coercion and Enticement.



Bradley Hudson  
Special Agent  
Department of Homeland Security,  
Immigration and Customs Enforcement

SUBSCRIBED TO AND SWORN TO BEFORE ME THIS 28 DAY  
OF MARCH 2008.



HONORABLE PAUL D. STICKNEY,  
United States Magistrate Judge  
Northern District of Texas

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

DONALD BRANTMAN, JR. (01)


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Criminal No. 3:08-MJ- 123

**WARRANT FOR ARREST**

TO: The United States Marshal and  
Any Authorized Officer of the United States

YOU ARE HEREBY COMMANDED to arrest DONALD  
BRANTMAN, JR. and bring him forthwith to the nearest available magistrate  
to answer a Complaint charging him with **Attempted Coercion and Entice-  
ment**, in violation of 18 U.S.C. § 2422(b).

  
PAUL D. STICKNEY  
UNITED STATES MAGISTRATE JUDGE

Issued at Dallas, Texas on this the 28 day of March, 2008.

**RETURN**

This warrant was received and executed with the arrest of the above-named defendant at

DATE RECEIVED: NAME AND TITLE OF ARRESTING OFFICER: SIGNATURE OF ARRESTING OFFICER

DATE OF ARREST: